

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:	:	
Martha Bell	:	Case No.18-23089GLT
	:	Chapter 13
Debtor(s)	:	
Martha Bell	:	
	:	Related to Document #58
Movant(s)	:	
	:	Hearing Date: 6/5/2019
vs.	:	
No Respondent Named	:	
Respondent(s)	:	

TRUSTEE'S RESPONSE/OBJECTION TO MOTION FOR AUTOMATIC STAY OF  
30 DAYS IN COURT'S DISMISSAL OF CASE

Ronda J. Winnecour, Chapter 13 Trustee, by her undersigned counsel,  
respectfully represents the following:

1. This case was filed on August 2, 2018
2. Ronda J. Winnecour is the Chapter 13 Standing Trustee in this case.
3. The Debtor is an individual currently incarcerated at an institution unknown to the Trustee.
4. The Debtor's case was dismissed on April 11, 2019. The Debtor seeks a thirty-day stay of that order.
5. The Trustee opposes Debtor's request for relief.
6. The Debtor's Motion is an attempt to hinder and delay her creditors. There is inconsequential equity in the real property and her plan is not feasible.

WHEREFORE, the Trustee requests that Debtor's motion be denied.

RONDA J. WINNECOUR,  
CHAPTER 13 TRUSTEE

Date: 05/15/19

by     /s/ Jana S. Pail      
Jana S. Pail - PA I.D. #88910  
Attorney for Trustee  
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CERTIFICATE OF SERVICE

I hereby certify that on the 15<sup>th</sup> of May 2019, I served one true and correct copy of the foregoing document on the following parties in interest by United States first-class mail, postage prepaid, addressed as follows:

Joseph S. Sisca, Esquire  
Assistant U.S. Trustee  
Suite 970, Liberty Center  
1001 Liberty Avenue  
Pittsburgh PA. 15222

Rodney Shepherd, Esquire  
River Park Commons  
2403 Sidney Street Suite 208  
Pittsburgh PA 15203

Martha Bell  
204 Castle Drive  
West Mifflin PA 15122

/s/Dianne DeFoor  
Office of Chapter 13 Trustee  
US Steel Tower – Suite 3250  
600 Grant Street  
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(412) 471-5566  
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